



Collective Giving Handbook

A partnership with The Idaho Community Foundation

Collective Giving Partnership Program

The Idaho Community Foundation (ICF) recognizes the strength of collective giving. ICF hosts an array of Collective Giving Partners, including Affiliates, Community Funds, and Giving Circles. These groups aim to foster philanthropy and enhance community impact across Idaho. Operating at a localized level, these Community Partners extend the reach of the Idaho Community Foundation.

Since 1988, the Idaho Community Foundation has effectively served as stewards, achieving significant economies of scale and bolstering its support for local communities.

Advantages of Collective Giving Partnerships

Collaborating with the Idaho Community Foundation (ICF) enables community members to leverage the foundation's nonprofit status, which offers a range of valuable support resources, including:

- Operational Support
- Leadership Services
- Marketing and Promotion
- Grant Making
- Fund Development
- Events & Programming

This partnership allows participating community members to avoid the need to establish their own 501(c)(3) nonprofit organization. Instead, they can operate under the Idaho Community Foundation while enjoying a variety of additional support and benefits.



Stronger Together.

Idaho is a place of possibility where everyone contributes to thriving communities. We strengthen communities through philanthropy, elevating nonprofit impact, and connecting Idahoans. Join us and let's do more good together.

Additional Services provided by The Idaho Community Foundation:

- Capacity building for the nonprofits
- Advocacy work on behalf of the nonprofit sector
- Community work to build a culture of philanthropy in Idaho

Collective Giving Types

Explore what would work best for you and your region

Affiliate: a Localized Community Foundation

This foundation focuses on serving a defined geographical region, with the goal of engaging local philanthropists, pooling resources, and distributing grants to nearby nonprofits.

- Funds are gathered from local philanthropists
- Grants are suggested by the chosen local advisory board

Giving Circle

A membership-based group that pools funds in order to provide grants to local nonprofits

- Membership based fundraising: each member paying member dues to compile funding
- Grants: advised from membership

Community Funds

A fund designed to unite the community around a specific cause or project, with the goal of developing or preserving a community element.

- Funding collected through local philanthropists
- Grants advised from the local advisory committee
- Structured around a specific location, example: "Eagle Community Fund"



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Starting a Community Partnership

Next steps for creating your regional giving program

To start a community partnership with the Idaho Community Foundation, the following steps can be followed to build the foundation of this advisory group

1. Gather support

Create a group of likeminded individuals that are excited by the idea and opportunity.

2. Finalize name

Create a name to identify this group.

3. Advisory Board

Identify at least 3 Initial Board members, determine length of term, process for succession.

4. What geographic and impact area do you cover?

What geographic boundaries and areas of impact does this group serve?

5. What do you want to fund?

- Endowment for a grant cycle
- Non-endowed for a fast response
- Special projects
- Scholarships

6. What types of funds do you create?

ICF staff can help you choose the right type of fund for your group.

7. Initial contributions

Initial contributions can get the fund started building towards the impact goals.

8. Creation of development and marketing plans

ICF staff can help prepare you with a strategy and materials to market your group.

Fees and Fund Types

Learn how to make the most impact

ICF staff invest dedicated time and expertise to support collective giving groups. Fees help offset a portion of the cost of this support. Fees collected stay in Idaho, strengthening collective giving and fostering a culture of philanthropy statewide.

When starting a fund with ICF, there are several fund types to consider, each with associated fees. Below is an overview of the fund options our collective giving partners most often use to achieve their goals and meet community needs.

Endowed

- **Purpose:** supporting the community in perpetuity
- **Minimum to establish fund:** \$25,000
- **Foundation Fees:** Typically, 1.0%-2.0% on the average daily fund balance with minimum fee of \$500, whichever is greater, plus investment fee of approximately .2%

Non-endowed

- **Purpose:** distributing funds into the community immediately. Not intended to last in perpetuity.
- **Minimum to establish fund:** \$25,000
- **Foundation Fees:** Typically, 2.0% of average daily fund balance with a minimum fee of \$500, whichever is greater, plus investment fee of approximately .2%. Some funds have fees on contributions (gift fees) between 1%-10% depending on the needs of the fund.

Administrative fund

- **Purpose:** sustaining the operations of the collective giving group
- **Foundation Fees:** It is anticipated that the fee shall be between 2.0% and 10.0% of contributions, depending on the needs of the fund, plus investment fee of approximately .2%.

Special Project fund

- **Purpose:** contributing to a specific community project
- **Foundation Fees:** It is anticipated that the fee shall be between 2.0% and 10.0% of contributions depending on the needs of the fund, plus investment fee of approximately .2%.

Scholarship

- **Purpose:** providing a scholarship to an individual or entity
- **Minimum to establish a fund:** \$50,000
- **Foundation Fees:** It is anticipated that the fee shall be between 2.0% and 10.0% of contributions depending on the needs of the fund, plus investment fee of approximately .2%.

Fees outlined above are an estimated based off of the typical needs of the collective giving partner. The ICF and the Collective Giving Partner will determine a mutually agreed upon fee schedule to be reviewed at least on an annual basis. Fees are based on the balance of the account every quarter.

Operational Support

We are here to help you succeed

Collective Giving Partners and ICF work together to grow the culture of philanthropy in Idaho. This relationship allows the Partner to be advisory in nature and ICF to hold the legal status. Because of this, it is critical to operate under ICF's partnership outline.

Operation Services	ICF	Partner	Notes:
Nonprofit 501 (c)(3) status	X		Partner will operate under the ICF legal/nonprofit status
Operational Insurance coverage	X		ICF maintains comprehensive General Liability insurance coverage
990 & Audit	X		ICF files an annual 990 and participates in an annual audit
Asset Management	X		ICF hosts a top tier investment committee that oversees all asset management
Financial Reporting	X		ICF will create quarterly standard fund report of financial activity including gifts, grants, expenses and investment returns.
Processing accounts payable and receivable	X		ICF will manage all accounts payable and receivable, along with any reimbursements (made within 30 days of purchase)
Contributions	X		ICF will process all gift contributions, allocate gift receipt to appropriate fund accounts, acknowledge gifts. Gifts may include online, check securities of various types or other assets. ICF will print and mail donation receipts.
Invoicing and scheduled gift management	X		ICF will send invoices to any entity as a request for contribution and gift reminders to donors who have made multi-year commitments to funds
Maintenance of the Fund's records	X	Support	ICF will hold all donor and grantee records with support from partner for any updated contact information
Donation Platform	X		ICF will manage the online portal where online gifts can be processed
Endowment Management	X		ICF board of directors annually determine a prudent spending rate for any endowment funds
Budget		X	Partner will manage administrative budget with ICF assistance

Leadership Services

Advisory Committee structure

Collective Giving Partners serve as Advisory Committees to the Idaho Community Foundation board of directors.

It is expected the Advisory Committee, as they would as members of a nonprofit board, will exercise care when making decisions and be faithful to and act in manner consistent with the mission of the funds and ICF. Advisory Committees determine the composition of leadership, succession and sub-committee membership (if any) each year. Advisory Committee members are reported to the Idaho Community Foundation annually.

Leadership Services	ICF	Partner	Notes:
Bylaws	X		Partner is not in need of creating bylaws, however, it is recommended Advisory Committee follows the expectations at the bottom of this page
Succession Planning	X	X	ICF can support in structuring a succession plan. Partner would support by identifying successors
Meeting Coordination		X	Partner will lead group coordination, meeting minutes and scheduling
Designate Leadership		X	Partner will vote on incoming group advisors for ICF to approve

Advisory committees is expected to:

- Follow normal rules of order for meeting processes and votes, Robert's Rules of Order
- Advisory Committee members are expected to disclose any conflict of interest
- Advisory Committee members are expected to maintain confidentiality of the work of the committee, fund operations, member dialogue, grants and policy decisions and other matters
- Advisory Committee Chair, Treasurer, and any member receiving donor information will sign a confidentially agreement protecting donor information
- Recommended quarterly meeting
- Document meeting activity

Marketing and Promotion

Sharing your program with your region and beyond

Marketing & Promotion Services	ICF	Partner	Notes:
Promote the partner	X	X	ICF will highlight partner in annual report and other available marketing materials- <i>Ongoing</i>
Logo and style guide	X		ICF will build unique logo and style guide for partner that provides partner consistency and recognition. This will consist of logo, font, colors, one-page template
Template and Graphics	X		Staff consultation on developing materials for fund development, grant applications, and other information for grant seekers- <i>twice annually, two week notice needed</i>
Email Newsletters	X	X	ICF can support the execute on quarterly newsletters with content directed from the partner, <i>two week notice needed</i>
Website	X	X	ICF can build a custom page on the ICF website or Affiliate can create independent website with oversight from ICF
Social Media	X	X	ICF can build custom template for partner to execute on social media with oversight from ICF. ICF staff can cross promote any social media posts
Promotion of grant cycle	X	X	Consultation on developing materials and mechanisms for grant cycles.- <i>once annually</i>
Mailings	X	X	ICF can support in the design of annual appeal with partner executing on the distribution. - <i>once annually, four week notice needed, any printing and mailing will be paid for and executed by the partner</i>
Media	X	X	ICF can create press release template for partner to publish- <i>twice annually</i>

All written communication published by the Collective Giving Partner shall clearly state that the partner is a Collective Giving Partner of the Idaho Community Foundation.

Grant Making

Distributing donations based on your needs

Operating a foundation entails many legal and IRS obligations, but a key advantage of collaborating with ICF is that we take care of all these responsibilities for you.

ICF diligently reviews and approves activities to guarantee full compliance, safeguarding you and your partners. With decades of experience, we assist groups in achieving their objectives, and we never unreasonably withhold approvals. The wording in this document emphasizes that ICF oversees compliance, allowing you to concentrate on making an impact.

Grant Making	ICF	Partner	Notes:
Advising grant distribution		X	Partner will make all recommendations for grant distribution in accordance with their fund agreement and ICF Grant Making Policy. With approval from ICF board
Grant Due Diligence	X		ICF will perform due diligence to confirm grant recipient eligibility. Grant making is only to 501(c)(3) nonprofit public charities under IRS Code Section 170 and governmental entities including public schools.
Grant portal and application infrastructure	X		ICF can provide grant portal technology to manage applications, distributions and reporting.
Grant making Strategy	X	X	Staff support in grant making strategy to ensure the most impactful grant investments
Education on grant making trends and best practices	X		ICF can provide top trends and themes around grant making best practices to maximize impact
Education on needs and trends of the nonprofit sector	X		ICF can provide top trends and themes around the nonprofit sector
Grant communication and nonprofit support	X	X	ICF can provide grant award and denial notifications to grant applicants. Partner may also send congratulatory announcement to grantees.
Unique grant support	X		ICF can support with unique grant cycles including running a scholarship fund or a special project fund- <i>once annually</i>
Grant documentation	X		ICF will maintain grant distribution history

Fundraising and Membership

Working together to raise funds

Regionalized fundraising thrives when it is driven by community involvement, addressing the specific needs of local communities with support from those same communities.

The ICF staff brings decades of fundraising expertise and is dedicated to helping community partners succeed in the fundraising arena. We provide strategic guidance and support for the fundraising initiatives of collective giving partners.

Some collective giving partners may focus on fostering engagement through membership rather than direct fundraising. The ICF staff is equipped to assist with both traditional fundraising efforts and membership development.

Fundraising and Membership	ICF	Partner	Notes:
Fundraising and Membership Plan Strategy	X	X	ICF support in plan techniques, i.e. building an annual plan, segmented donors, donor engagement opportunities, for partner to execute
Fundraising/Membership consultation	X	X	ICF staff can consult on any fundraising strategies, membership growth opportunities, messaging, or stewardship plans, for partner to execute
Education	X	X	Free Nonprofit Center membership and access to any Nonprofit Center trainings
Fundraising and Membership asks		X	Partner is responsible for outreach and solicitation to donors or members
Donor Prospecting		X	Partner will lead identifying local contacts and prospects
Planned Gifts	X	X	ICF will support with any estate or complex financial gifts that the partner might secure

Events and Programming

Planning for celebrations

Since the Idaho Community Foundation is the legal entity, it is critical any contracts list the legal name and are signed by the appropriate representative at the Idaho Community Foundation.

Depending on the event, additional insurance might be required to be purchased. That purchase will be the responsibility of the partner.

Partner and ICF will discuss and coordinate any events that serve alcohol, host auctions, and any tax deductions of sponsorship and ticket sales.

Event and Programming Services	ICF	Partner	Notes:
Event Design	X	X	ICF staff can support in event design and consultation
Event Execution		X	Partner will be responsible for onsite management and execution of any events
Event Registration	X		ICF can host online event registration including event platform, ticket sales, RSVP lists- <i>twice annually</i>
Event Communication		X	Partner will send event communication to any event attendees
Event Contracts and Vendors	X		ICF will sign all contracts under the name of the Idaho Community Foundation
Event Supplies		X	Partner will coordinate all event supplies and materials
Event Attendance	X		ICF staff would love to attend any event, welcoming philanthropists, showing support

Appendix

Additional information

- *Payment procedures*
- *ICF Substitute w9*
- *Volunteer Reimbursement form*
- *Confidentiality Policy*
- *Conflict of interest form*
- *Grantmaking policy*

Payment Procedures

Reimbursements and vendor invoices

Requesting Vendor Payment

ICF can pay vendors directly on behalf of any collective giving partner. In order to pay, we need:

- An itemized invoice that includes sales tax, as applicable. ICF is not exempt from sales tax.
 - Please note that we must have an invoice, not a statement.
- Approval from one of the partner co-chairs to pay the invoice. A simple email requesting that the invoice be paid from which Fund is sufficient.
- If it is the first time ICF has paid this vendor, the vendor will need to complete our substitute W9 form before we can issue payment. We can also accept the [current IRS W9 form](#)

Requesting Volunteer Reimbursement

Alternatively, ICF can reimburse a collective giving partner member/volunteer for an expense they paid. In order to issue a reimbursement directly to a committee member/volunteer, we need:

- An email from one of the co-chairs requesting the committee member/volunteer be reimbursed and documentation of fund reimbursement will come from.
- A completed Volunteer Reimbursement Form signed by both the committee member/volunteer and one of the co-chairs.
 - No need to complete the account #/code section, as our staff will do that.
 - Please note that reimbursement requests cannot span a month on a single form. So, if two expenses are incurred in separate months, they need to please each have their own reimbursement form.
- Itemized receipt(s) that includes sales tax, as applicable.
- If it is the first time ICF has paid this committee member/volunteer, the individual will need to complete our substitute W9 form before we can issue payment. We can also accept the [current IRS W9 form](#).

The most important thing is that we must receive reimbursement requests within 30 days of the time the expense was incurred. Likewise, invoices must be submitted for payment within 30 days of the date on the invoice. Requests received after 30 days will not be approved. Please note that it takes ICF approximately two weeks to process payments/reimbursements.



IDAHO COMMUNITY FOUNDATION, INC.
CONFIDENTIALITY POLICY

Last Revised: May 14, 2015

The nature of the Idaho Community Foundation, Inc.'s role as a funder, fundraiser, leader, convener, and decision maker in the community results in the acquisition of extensive information that is, or may be considered, confidential. Much of this information is acquired by the Foundation due to its reputation for trust, its efforts to make fair decisions, and its ability to advocate for the good of Idaho. To safeguard the Foundation's integrity in its various roles, to protect its capacity to gather the data necessary to fulfill those roles, and in an effort to uphold the standards of the industry, the Foundation subscribes to the following policy regarding confidentiality.

Except to the extent necessary to engage in the business of the Foundation and to comply with applicable laws and regulations, Foundation Board members, Committee members, Grants Panel members, volunteers and employees should not engage in the discussion of, use or disclose to any other person or entity confidential Foundation information without the express authorization of the Foundation's President or her designee. For purposes of this policy, confidential Foundation information includes but is not limited to:

- donor records, donor financial statements or any other information, whether written or oral, related to or provided by individual donors or potential donors;
- information related to Board members, committee members, panel members or volunteers, not including lists of their names;
- employment information regarding Foundation personnel;
- detailed financial records of the Foundation, not including audited financial statements which are a matter of public record;
- information related to the Foundation's strategic investment strategies;
- information related to grant applicants and grantees except as necessary to process an application and/or grant.

The President shall outline in writing annually the individuals who may share information about ICF and the scope of the information that each may share. The scope of the information that may be disclosed may include:

- information regarding the Foundation's services, methods of operations, operating practices, marketing plans, systems or strategies;

- any other information regarding the business affairs or operating policies or procedures of the Foundation.

The Foundation also has a role to share information about itself. This is evidenced by the Annual Report, Form 990, investment and spending policies, and similar information. Such items are not confidential information for purposes of this policy.

Foundation personnel are expected to exercise sound judgement in securing information taken outside of the Foundation's offices or copied from its network. Any information so removed should be returned as soon as possible and deleted from laptops or other personal devices.

Individuals, including board members, employees and volunteers who have knowledge of or information related to violations or possible violations of this policy shall report their concerns to the President of the Foundation or her designee, or the chairperson of the Foundation's Board of Directors. Employees who violate this policy are subject to disciplinary action up to and including termination. Others who violate this policy also are subject to remedial action which may vary depending on their relationship with the Foundation.

All Foundation Board members, Committee members, Grants Panel members, volunteers and employees shall be required to acknowledge that they have received a copy of this Confidentiality Policy and agree to comply with its terms.

Name

Date

This Confidentiality Policy is effective the 14th day of May, 2015 and is intended to replace all prior versions.



IDAHO COMMUNITY FOUNDATION, INC.

Conflict of Interest Policy

Last Revised: May 14, 2015

1. PURPOSE.

The purpose of the Conflict of Interest Policy is to protect the Idaho Community Foundation, Inc.'s ("ICF") interest when it is contemplating entering into a transaction or arrangement that might benefit the private interest of an officer, director, employee or volunteer of ICF or might result in a possible excess benefit transaction. This Policy is intended to supplement, but not replace, any applicable state and federal laws governing conflict of interest applicable to nonprofit and charitable organizations.

2. DEFINITIONS.

2.1 Interested Person. Any director, principal officer, or member of a committee or staff, who has a direct or indirect interest, as defined below, is an interested person. Section 2.3(b) shall not apply to staff since staff has a compensation arrangement with ICF.

2.2 Direct and Indirect Interests. A person has a direct conflict of interest when the person may personally and materially receive a benefit from the outcome of the decision or transaction, or the person's family may receive such benefit. Typically, this involves the personal receipt of a financial benefit. However, a direct conflict of interest may arise where the person's involvement or affiliation, in any form, in another organization creates an interest or bias that is adverse to ICF.

A person (or the person's family member) has an indirect conflict of interest when the person is a board member, director, officer, principal or trustee of an organization, or has a "financial interest" in the organization that is a party to the transaction. Typically, an indirect conflict of interest is one where the person is a board member of an organization receiving an ICF grant or business contract, but where the person does not benefit personally or materially.

2.3 Financial Interest. A person has a financial interest if the person has, directly or indirectly, through business, investment, or family: (a) an ownership or investment interest in any entity with which ICF has a transaction, grant or arrangement; (b) a compensation arrangement with ICF or with any entity or individual with which ICF has a transaction, grant or arrangement; or (c) a potential ownership or investment interest in, or compensation arrangement with, any entity or individual with which ICF is negotiating a transaction, grant or arrangement.

Compensation includes direct and indirect remuneration as well as gifts or favors that are not insubstantial.

A financial interest is not necessarily a conflict of interest. Under Section 3.3 below, a person who has a financial interest may have a conflict of interest only if the board of directors or appropriate committee decides that a conflict of interest exists.

3. PROCEDURES.

3.1 Duty to Disclose. In connection with any actual or possible conflict of interest, an interested person must disclose the existence of the interest and be given the opportunity to disclose all material facts to the directors and members of committees with board delegated powers considering the proposed transaction or arrangement.

3.2 Right to Recuse. After disclosure of an actual or potential conflict of interest, the interested person may recuse from participation in the consideration and determination of the transaction. The board of directors or committee may require the interested person to leave the meeting during the pendency of the action.

3.3 Determining Whether a Conflict of Interest Exists. After disclosure of the conflict of interest and all material facts, and after any discussion with the interested person, he/she may leave the board of directors or committee meeting while the determination of a conflict of interest may be discussed and voted upon. The remaining board of directors or committee members shall decide if a conflict of interest exists.

3.4 Procedures for Addressing the Conflict of Interest. If the board of directors or committee determines that a conflict of interest exists, the body shall have the following alternatives: (a) permit the person to participate despite the conflict of interest; (b) investigate alternatives to the transaction that eliminate the conflict of interest; or (c) require the interested person to recuse from participation in the discussion and vote on the transaction. The body may require the interested person to exit the meeting during the pendency of the action.

(a) Participation Despite Conflict. An interested person shall not vote or participate in discussions where the person has a direct conflict of interest, as defined above, in the outcome of the decision or transaction. The person may participate in a discussion and vote authorizing grants to a large number of organizations that have been appropriately vetted by the Grants Committee even though the person has an indirect conflict with one of the organizations that will receive a grant.

(b) Investigate Alternatives. The chairperson of the board of directors or committee may, if appropriate, appoint a disinterested person or committee to investigate alternatives to the proposed transaction or arrangement. After exercising due diligence, the board of directors or committee may determine whether ICF can obtain with reasonable efforts a more advantageous transaction or arrangement from a person or entity that would not give rise to a conflict of interest.

(c) Require Recusal. If a more advantageous transaction or arrangement is not reasonably possible under circumstances not producing a conflict of interest, the board of directors or committee shall determine by a majority vote of the disinterested directors whether the transaction or arrangement is in ICF's best interest, for its own benefit, and whether it is fair and reasonable. In conformity with the above determination, it shall make its decision as to whether to enter into the transaction or arrangement.

3.5 Violations of the Conflicts of Interest Policy. (a) If the board of directors or committee has reasonable cause to believe a member has failed to disclose actual or possible conflicts of interest, it shall inform the member of the basis for such belief and afford the member an opportunity to explain the alleged failure to disclose; and (b) if, after hearing the member's response and after making further investigation as warranted by the circumstances, the board of directors or committee determines the member has failed to disclose an actual or possible conflict of interest, it shall take appropriate disciplinary and corrective action.

4. RECORDS OF PROCEEDINGS.

The minutes of the board of directors and all committees with board delegated powers shall contain: (a) the names of the persons who disclosed or otherwise were found to have a financial or other interest in connection with an actual or possible conflict of interest, the nature of the interest, any action taken to determine whether a conflict of interest was present, and the board of director's or committee's decision as to whether a conflict of interest in fact existed; and

(b) the names of the persons who were present for discussions and votes relating to the transaction or arrangement, the content of the discussion, including any alternatives to the proposed transaction or arrangement, and a record of any votes taken in connection with the proceedings.

5. COMPENSATION.

(a) A voting member of the board of directors who receives compensation, directly or indirectly, from ICF for services is precluded from voting on matters pertaining to that member's compensation; (b) a voting member of any committee whose jurisdiction includes compensation matters and who receives compensation, directly or indirectly, from ICF for services is precluded from voting on matters pertaining to that member's compensation; and (c) no voting member of the board of directors or any committee whose jurisdiction includes compensation matters and who receives compensation, directly or indirectly, from ICF, either individually or collectively, is prohibited from providing information to any committee regarding compensation.

6. ANNUAL STATEMENTS.

Each director, principal officer and member of a committee with board delegated powers shall annually sign a statement which affirms such person: (a) has received a copy of the Conflicts of Interest Policy; (b) has read and understands the Policy; (c) has agreed to comply with the Policy; and (d) understands ICF is charitable and in order to maintain its federal tax exemption it must engage primarily in activities which accomplish one or more of its tax-exempt purposes.

7. PERIODIC REVIEWS.

To ensure ICF operates in a manner consistent with charitable purposes and does not engage in activities that could jeopardize its tax-exempt status, periodic reviews shall be conducted. The periodic reviews shall, at a minimum, include the following subjects: (a)

whether compensation arrangements and benefits are reasonable, based on competent survey information, and the result of arm's length bargaining; (b) whether partnerships, joint ventures, and arrangements with management organizations conform to ICF's written policies, are properly recorded, reflect reasonable investment or payments for goods and services, further charitable purposes, and do not result in unfair personal advantages, impermissible private benefit or in an excess benefit transaction.

8. USE OF OUTSIDE EXPERTS.

When conducting the periodic reviews as provided for in Section 7, ICF may, but need not, use outside advisors. If outside experts are used, their use shall not relieve the board of directors of its responsibility for ensuring periodic reviews are conducted.

This Conflict of Interest Policy is effective the 14th day of May, 2015 and is intended to replace all prior versions.



GRANTMAKING POLICY OF IDAHO COMMUNITY FOUNDATION, INC.

Last Revised: November 10, 2024

Idaho Community Foundation, Inc. (Community Foundation) is committed to ensuring that its donors' intentions are honored and that grant distributions from funds administered by the Community Foundation are used accordingly. The purpose of this policy is to ensure that grant recommendations and proposals are appropriately and consistently evaluated and considered and that grant-related decisions are made with sufficient levels of oversight and engagement.

VALUES ALIGNMENT

Grants will be made for charitable purposes primarily in, or for the benefit of, the community of the State of Idaho. The Community Foundation honors the fundamental value and dignity of all individuals, and will not support organizations, through donor recommendations or otherwise, that engage in hateful activities. Hateful activities are defined to mean activities that vilify, humiliate, incite, or engage in hatred, violence, intimidation, harassment, threats, slander or defamation targeting an individual or group based on their actual or perceived race, color, religion, national origin, ethnicity, immigration status, gender, gender identity, sexual orientation or disability.

As part of its due diligence, the Community Foundation will consult resources such as the U.S. Terrorist Organization list and any other pertinent resources to identify and update information regarding potentially hateful activities and organizations. Upon identifying that a grant may be made towards a potentially hateful activity and/or organization, staff shall consult with the President and Chief Executive Officer who shall decide what additional research and due diligence needs to be done.

APPROVAL AUTHORITY AND VARIANCE POWER

The Community Foundation's Board of Directors (Board), Regional Councils, external advisory committees and staff have certain duties in connection with this policy. Review and approval requirements vary depending on the type of fund and/or defined grantmaking process. The Board maintains final authority and grants are subject to variance power in accordance with Article THIRD of the Articles of Incorporation of the Community Foundation. This allows the Board to modify any restriction or condition of any specified charitable purposes or to specified organizations if in the sole judgment of the Board such restriction or condition becomes, in effect, unnecessary, undesirable, incapable of fulfillment, or inconsistent with the charitable needs of the Idaho community.

FUND SPECIFIC ADMINISTRATION

The Community Foundation administers several types of charitable funds. Grants from each fund are subject to due diligence performed by staff and must meet all requirements provided by the Internal Revenue Service and in accordance with the Community Foundation's Value Alignment.

Restrictions unique to fund types or grant or scholarship types are as noted. General eligibility is enumerated on Schedule A. Eligible organizations generally must not have an outstanding report due for a grant previously provided by the Community Foundation.

The Foundation will not approve grants to:

- Individuals, including grants made directly to an organization for the benefit of a specific individual.
- Donors, advisors or related parties associated with the fund.
- Non-charitable purposes.
- Pay dues or membership fees which come with material benefits.
- Fulfill a legally enforceable pledge that has been documented through a signed commitment to the recipient nonprofit.
- Purchase tickets to an event. Grants to pay for an event sponsorship are acceptable, but the advisor must decline any material benefits associated with the sponsorship.
- Pay for school tuition, apart from an established scholarship program.
- Support a political party or candidate for election.

Grants covered by this policy may not be awarded to any member of the Community Foundation's Board of Directors, any substantial contributor to the Community Foundation, any employee of the Community Foundation, or any other disqualified person with respect to the Community Foundation. Grants also may not be awarded to any donor/advisor or substantial contributor to the fund making the award, to any member of a selection committee for such award, or to any members of their families. Finally, grants covered by this policy may not be made for a purpose that is not charitable.

Operating, Unrestricted and Field of Interest Funds without Advisory Committees

These fund types support the Community Foundation, Forever Idaho grants, programs and strategic initiatives. The available spendable amount, along with any donor-defined preferences, are tracked and applied by staff through the various grantmaking processes highlighted in this section.

Forever Idaho Grants

Applications are accepted for Forever Idaho grants through open and responsive grant rounds each year. Primarily, grants are general operating grants for nonprofit organizations or project-specific grants for schools and municipalities. Vetted proposals are presented to the respective Regional Council for review and recommendations. Final reports are generally not required.

Strategic Initiatives and Program Grants

Applications for funding or participation in a program or initiative varies. Grants made as part of these strategic initiatives and programs may have broader criteria and different reporting requirements. The process of reporting may vary.

Field of Interest Funds with Advisory Committees (including Affiliate and Giving Circles)

Grantmaking from some funds are facilitated by advisory committees comprised of volunteer members and which are supported by Community Foundation staff. The grantmaking cycle varies by fund, but advisory committees make funding recommendations to the Community Foundation and staff complete due diligence. Committee members may participate in site visits or interviews. Eligibility and reporting requirements vary by fund.

Affiliate and Giving Circle Funds

These regional and/or identity-based funds conduct competitive grantmaking cycles, open to eligible nonprofits working within the funds' respective geographies or fields of interest. Advisory committees review submitted proposals and then make funding recommendations to the Community Foundation and staff complete due diligence. Committee members may participate in site visits or interviews.

Agency Funds

Nonprofit organizations can create charitable funds and they are the sole beneficiary of the fund. Staff completes due diligence to ensure the organization meets eligibility requirements to establish the fund. The organization must maintain its eligibility in order to continue receiving grants from the fund.

Designated Funds

Grants from designated funds are distributed to one or more charitable organizations identified by the donor in the agreement that established the fund. Staff completes due diligence to ensure the organizations meet eligibility requirements to establish the fund. The organization must maintain its eligibility in order to continue receiving grants from the fund. If any designated organization ceases operation, substantially alters its mission or otherwise becomes ineligible to receive grants, the Community Foundation may consider replacement of the charity with another organization if documented in the fund agreement. If that is not an option, the Community Foundation may consider the following options, listed in order of preference:

1. Reallocate the spendable amount among the remaining designated charities.
2. Apply the spendable amount to the Forever Idaho program or Field of Interest grantmaking that most closely matches the donor's original intent.

Some designated fund agreements or related documentation may require that a post-grant report be submitted before the following funding cycle. The Community Foundation may also implement a reporting requirement if deemed necessary.

Donor Advised Funds

Grants from donor advised funds are recommended by the advisors identified in accordance with the terms of the fund agreement and staff complete due diligence. Eligible grantee types are enumerated on Schedule A. There are generally no reporting requirements unless specifically requested by the advisor or at the discretion of the Community Foundation.

Scholarship Funds

Scholarship grants are intended to defray the cost of post-secondary education, including tuition and related expenses, at an eligible college, university or technical training institute of a recipient's choice. Grants from scholarship funds may directly benefit a named individual. Staff work with donors to establish funds that fulfill their charitable goals and feature clear eligibility requirements. This policy shall be interpreted so as to ensure the Community Foundation's compliance with all applicable requirements of the Internal Revenue Code, Treasury Regulations and guidance from the Internal Revenue Service.

Eligibility and Application

The Community Foundation facilitates scholarship distribution cycles beginning with notifications of award availability sent to the appropriate selection committees and/or schools. Criteria for application, eligibility and selection are defined in the agreement that created each scholarship fund. Grantees are to be selected on an objective and nondiscriminatory basis. The group from which grant recipients are selected must be sufficiently broad so that giving grants to one or more members of the group fulfills a charitable purpose; however, selection from such a group is not necessary if one or more grant recipients are selected on the basis of their exceptional qualifications to carry out the purposes of the grant or it is otherwise evident that the selection is particularly calculated to effectuate the charitable purpose of the grant rather than to benefit particular persons or a particular class of persons.

Criteria used for selecting scholarship recipients may include, but are not limited to, the following:

- Prior academic performance;
- Community service;
- Financial need;
- Recommendations from instructors or others who have knowledge of the applicant's capabilities, intended course of study or career path;
- Additional biographical information regarding an applicant's career, academic and other relevant experiences, financial need; and
- The committee's conclusions as to the applicant's motivation, character, ability, or potential.

Criteria may also include the applicant's place of residence, past or future attendance at a particular school, past or proposed course of study or evidence of his or her artistic, scientific or other special talent. Preference may be given to applicants of a

particular sex, race, ethnic background or religion so long as such preference does not violate public policy.

Grant Selection Committees

Scholarship applications are generally reviewed by selection committees, which select recipients based on the donor defined criteria, and submit their award recommendations to staff with required documentation. The Foundation shall appoint all members of any selection committee charged with the evaluation of candidates for scholarship grants. The structure of selection committees varies by scholarship but generally falls into one of the following categories:

- ICF Scholarship Committee: Volunteer reviewers recruited and vetted by staff.
- College Committee: Roster reported to staff with recipient selections.
- High School Committee: Roster reported to staff with recipient selections.
- Other External Committee: Volunteer reviewers recruited by fund donor/ advisor.

A fund's donors may not control the selection committee. This means that no combination of donors, persons appointed or designated by donors, and persons (a term that includes partnerships, corporations and trusts as well as individuals) related to them may constitute a majority of the committee, be given a veto power, be allowed to chair the committee or otherwise be permitted to control the committee's decisions. If a donor/advisor recommends a person for appointment to a selection committee based on objective criteria related to the expertise of such person, such person will not be deemed to be appointed or designated by the donor/advisor.

Donor/advisors and related persons may provide advice with respect to the selection of grant or award recipients solely as members of a selection committee. This means that donors may not pre-screen applications and choose those to be referred to the committee. It also means that donors may not make a final selection from among candidates approved by the committee.

Every member of the selection committee must adhere to the relevant policies of the Community Foundation as they may be adopted and amended from time to time, including without limitation the Community Foundation's conflict of interest and confidentiality policy. Each member of any selection committee covered by this policy must disclose any personal knowledge of and relationship with any potential grantee under consideration and refrain from participation in the award process in a circumstance where he or she would derive, directly or indirectly, a private benefit if any potential grantee or grantees are selected over others.

Review and Approval

Scholarship grant awards are paid to the educational institution that the award recipient will be attending. The institution must be an accredited college, university or technical training institute. Due diligence verifying the institution's eligibility will be

completed by staff prior to grant disbursement. Any funds not used for the purpose of the award (for example, if the recipient withdraws from enrollment) must be returned to the scholarship fund at the Community Foundation. Any reporting requirements for the scholarship fund are defined in the fund agreement and articulated in the scholarship criteria.

Multi-Year Scholarship Grants

Scholarships which provide more than one year of financial aid to the recipient require staff to obtain the following information from the student each year before funding is released:

1. Academic transcript from the most recent semester; and
2. Proof of registration for the upcoming semester.

For all scholarship grants, scholarship payments may be held for up to a maximum of two years if a student communicates to the Community Foundation that they had to withdraw from enrollment due to hardship or another reason subject to review by Foundation staff.

Special Project Funds

Special project funds are established for a particular charitable purpose and often exist for a limited time. These funds may be created by a donor and/or have an advisory committee. Distributions may also be made to individuals, non-charitable organizations and/or for-profit enterprises, if appropriate. Grants to charitable organizations are recommended by the advisory committee and staff completes due diligence. Additional criteria, forms and grantee reporting requirements vary by fund.

OTHER GRANTMAKING GUIDANCE AND CONSIDERATIONS

Grants to Fiscally Sponsored Organizations

Fiscal sponsorship describes an arrangement where a tax-exempt organization, accepts contributions for the purposes of a project that is spearheaded by an entity outside the charity but that furthers the sponsor's own charitable purposes. Fiscal sponsorship allows an otherwise ineligible organization to seek grants. In order for a fiscally sponsored grant recommendation to be considered, the applicant must:

- Have an established relationship with a fiscal sponsor;
- Clearly demonstrate in its application that the grant is for a charitable purpose as defined by the Internal Revenue Code; and;
- Include a copy of a fully executed fiscal sponsorship agreement.

Grants to Supporting Organizations

Grants may support Type I, Type II or functionally integrated Type III supporting organizations. The Foundation may make grants to Type III non-functionally integrated supporting organizations with expenditure responsibility. Staff will determine the public charity status and type of the supporting organization through standard due diligence. If staff

is unable to determine the status and type of the supporting organization, staff may rely on reasoned opinion, including the determination of the Community Foundation's legal counsel, and may require expenditure responsibility.

The Community Foundation must exercise expenditure responsibility if a proposed grant from a donor advised fund to a supporting organization that supports a public charity is controlled directly or indirectly by the donor, donor-advisor, or a related person.

Grants to International Organizations

Grants may be made to support charitable international efforts but funds must be deposited in the United States by a qualified charitable organization per Schedule A.

Grants Considered Pass-throughs

The Foundation may at its discretion accept contributions ultimately intended for another nonprofit organization in order to lessen the administrative burden on the recipient nonprofit or, in special circumstances, to protect a donor's anonymity. Requests for pass-through grants to nonprofits will be considered on a case-by-case basis.

Due Diligence

Staff perform due diligence on all grant recommendations and proposals. The following steps will occur to verify that:

- The requestor has the authority to make the recommendation;
- The recommendation aligns with the purpose of the fund;
- The fund has a sufficient spendable amount;
- The organization is consistent with the Values Alignment of the Community Foundation;
- The recommended grantee meets the appropriate eligibility criteria including their exempt status.

The following resources may be used to verify an organization's tax status and eligibility to receive a grant from a fund:

- GuideStar/Candid;
- Internal Revenue Service Tax Exempt Organization Search;
- Charity Navigator;
- Site visits and interviews;
- Other internet research, including but not limited to, the nonprofit's website or other resources that track organizations.

Expenditure Responsibility

Grants to charities that are defined as ineligible, per Schedule A, may be considered if staff confirms through due diligence that the grant will be used for charitable purposes and if expenditure responsibility is exercised. Expenditure responsibility requires:

- Conducting a pre-grant inquiry including a reasonable investigation of the grantee to ensure that the proposed activity is charitable, and that the grantee is

able to perform proposed activity.

- Executing a written agreement with the grantee that specifies the charitable purposes of the grant and includes provisions that prohibit use of the funds for lobbying activities and require the grantee to return any funds not used for the designated purposes.
- Requiring the grantee to maintain the grant funds in a separate fund so that charitable funds are segregated from non-charitable funds.
- Requiring the grantee to provide regular reports on the use of the funds and the charitable activity supported by the grant.

Disbursement of Funds

Due to the time and effort involved for due diligence for a grant recommendation, the Community Foundation has established minimum amounts. Grants must be a minimum of Two-hundred and Fifty Dollars and no/100 Cents (\$250.00). Scholarships must be a minimum of One Thousand Dollars and no/100 Cents (\$1,000.00). Circumstances may apply where the President and CEO may consider exceptions to the minimums. Donors will not be allowed to personally deliver checks.

Approval

Grants from funds with advisory privileges require pre-approval from the Board if the dollar amount exceeds Twenty-five Thousand and no/100 Cents (\$25,000.00). Staff are authorized to disburse all other grants without pre-approval.

Recovery of Misused Funds

If the Community Foundation learns that all or any part of a grant is not being used according to its stated purpose, the Community Foundation reserves the right to take all reasonable and appropriate steps to recover the grant funds and/or ensure restoration of the diverted funds.

Reporting

The Foundation reserves the right to withhold grant funding to an organization when:

1. The organization has outstanding and incomplete reporting requirements from previous grants;
2. The Community Foundation determines that there has been a change to the organization's tax status which impacts its eligibility;
3. The organization is subject to litigation, regulatory interventions or court proceedings that the Community Foundation determines, in its sole discretion, impact the charitable use of grant funds; or
4. The Foundation determines that there has been any violation of the terms and conditions associated with the organization's acceptance and use of grant funding.

Conflict of Interest Disclosure

The members of advisory or selection committees are to abide by the Community Foundation's conflict of interest and confidentiality policies and are required to disclose in writing any potential conflicts of interest.

Advised Fund Activity

If a fund advisor does not provide recommendations for distributions from an advised fund in any three (3) consecutive years, staff will attempt to contact the most recent fund contacts on file to discuss possible distribution options, or to ensure that an agreed upon distribution plan is documented. Attempts to contact will be made through multiple channels including phone, email and mail, when possible.

After thirty days (30) from the third contact attempt, the spendable amount will be transferred to the appropriate regional or statewide Forever Idaho fund.

GRANTMAKING POLICY

SCHEDULE A – ALLOWABLE GRANTING ACTIVITIES BY FUND TYPE

Community Foundation Fund Types

			Unrestricted & Field of Interest	Field of Interest with Advisory	Agency	Designated	Advised	Scholarship	Special Project		
			FI	SIP							
501(c)(3) Charitable, Religious or Educational Organizations			Examples								
	Public Charity	Idaho Foodbank, American Red Cross	Y	Y	Y	Y	Y	Y	*	Y	
	Private Operating Foundation	Idaho Hispanic Foundation	Y	Y	Y	Y	*	Y	*	Y	
	Private Non-Operating Foundation	Family foundations	*	*	N	N	N	N	N	*	
	Supporting Organization	School District 25 Education Foundation	*	*	*	N	N	*	N	*	
	Religious Organizations	Churches, temples, mosques	Y	Y	Y	Y	Y	Y	*	Y	
	Schools and Municipalities	American Falls School District, City of St. Maries	Y	Y	Y	Y	Y	Y	*	Y	
Other 501(c) Exempt Status Types			Examples								
(1)	Corporations Organized Under Act of Congress	Cooperative Federal Credit Union	Y	Y	Y	N	*	Y	N	Y	
(2)	Title-holding Corporations	IBEW Local Union 97 Building Corporation	N	N	N	N	N	N	N	N	
(4)	Community Social Welfare Organizations	Volunteer fire departments, civic associations	N	N	N	N	N	N	N	N	
(5), (16)	Labor, Agricultural and Horticultural Organizations and Cooperative Organizations to Finance Crop Organizations		N	N	N	N	N	N	N	N	
(6)	Business Leagues	Chambers of commerce, trade groups	*	*	*	N	N	*	N	*	
(7),(8),(10)	Lodges, Fraternities, Societies and Recreation Clubs	Athletic and country clubs, Elks, Knights of Columbus	N	N	N	N	N	N	N	N	
(9)	Voluntary Employees' Beneficiary Associations	Labor union	N	N	N	N	N	N	N	N	
(11)	Teachers' Retirement Fund Associations		N	N	N	N	N	N	N	N	
(12),(15),(26),(29)	Insurance and Services at Cost		N	N	N	N	N	N	N	N	
(13)	Cemetery Companies	Cortland Rural Cemetery	*	*	*	N	N	*	N	Y	
(14)	State-Chartered Credit Unions and Other Mutual Financial Organizations		N	N	N	N	N	N	N	N	
(17),(18),(22)	Pensions and Unemployment Trusts		N	N	N	N	N	N	N	N	
(19),(23)	Veterans' Organizations Before and After 1880	American Legion posts	N	N	N	N	N	*	N	Y	
(20)	Repealed		N	N	N	N	N	N	N	N	
(21),(24), (25)	Black Lung Benefit, Retirement and Other Trusts		N	N	N	N	N	N	N	N	
(27)	State-Sponsored Workers' Compensation Organizations		N	N	N	N	N	N	N	N	
(28)	National Railroad Retirement Investment Fund		N	N	N	N	N	N	N	N	
Other Non-Exempt Status Types											
	For-profit Organizations		N	N	N	N	N	N	*	*	
	Individuals		N	N	N	N	N	N	*	*	
Notes											
FI	Forever Idaho Grants										
SIP	Strategic Initiatives and Program Grants										
*	May be allowable after additional due diligence. Expenditure responsibility requirements will vary.										